

EXHIBIT A

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:)	Chapter 11
)	
YELLOW CORPORATION, <i>et al.</i> ¹)	Case No. 23-11069 (CTG)
)	
Debtors.)	(Jointly Administered)
)	
)	Re: _____
)	
_____)	

**[PROPOSED] ORDER GRANTING MOTION OF ANTHONY MARTINO
FOR ORDERS GRANTING RELIEF FROM THE AUTOMATIC STAY**

AND NOW THIS _____ day of _____ 2023, upon consideration of the *Motion Of Anthony Martino For Orders Granting Relief From The Automatic Stay* (the “Motion”), the Court having determined that good and adequate cause exists for approval of the Motion, and the Court having determined that no further notice of the Motion is necessary,

IT IS ORDERED:

1. That the Motion is GRANTED as set forth herein; and
2. The automatic stay of 11 U.S.C. § 362(a) of the Bankruptcy Code is immediately modified to allow Movant to fully prosecute his claims in the Illinois Federal Action against the YRC Defendants to conclusion, including through final judgment and any and all appeals therefrom; and
3. Subject to further modification of the automatic stay by this Court, the Movants shall be entitled to seek recovery solely against the proceeds of any applicable liability insurance policy.

¹ A complete list of each of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors’ proposed claims and noticing agent at <https://dm.epiq11.com/YellowCorporation>. The location of Debtors’ principal place of business and the Debtors’ service address in these chapter 11 cases is: 10990 Roe Avenue, Overland Park, Kansas 66211.

4. This Order does not prevent Movant from seeking further relief from the automatic stay in connection with the Illinois Federal Action or otherwise.

5. The fourteen day stay period imposed by Federal Rule of Bankruptcy Procedure 4001(a)(3) is waived with respect to the relief granted herein.

6. This Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation and enforcement of this Order.